

SHEILA LINDERMAN

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August 1, 2005

To: The National Organic Standards Board (NOSB)

RE: Comments on the Handling Committee's (HC) Recommendation Relative to "Agricultural" and "Non-agricultural" Substances

I support the request to the NOSB by Marroquin International Organic Commodities Services, Inc., on July 30, 2004, to reclassify yeast as an "agricultural product" instead of a "non-agricultural substance." Reclassification in this way is a necessary step in allowing the production of organic yeast, and therefore, allowing for another organic ingredient that requires other organic products for its production.

While my letterhead says that I am an organic certification consultant, I should state, here, that I was a professional baker for many years, and before that, a biologist. I find the distinction drawn between yeasts and mushrooms in the HC's proposed "Guidance Document" disturbingly arbitrary. Both are living organisms which, when provided with appropriate nutrients, metabolize those nutrients, grow, reproduce, produce waste and by-products, and eventually die. That yeasts are single-celled organisms is irrelevant. How they are grown is equally irrelevant when discussing whether or not they are agricultural. That only becomes relevant when determining whether or not they are organic.

That yeast cells are naturally occurring is indisputable. The 10-year-old starter that many bakers have in their refrigerators—started from mashed organic fruit and fed nothing but organic flour—is proof of that, as is naturally fermented wine. That there is no preference given, at the very least, to these types of yeast when producing organic bread or wine is unfortunate. Instead, by keeping yeast classified as a non-agricultural substance, the NOSB is allowing for the use of commercially-produced yeasts in organic products. These yeasts are manufactured using caustic lye and sulfuric acid. This would appear to be at odds with OFPA, as well as with other parts of the National List, yet commercial yeast is used every day in "organic" bread.

Furthermore, I do not understand why the HC and the NOSB insist upon the continued classification of yeast as non-agricultural, when certified organic yeast exists in Europe. By definition, the European yeast must be agricultural in order to become certified. I appeal to the NOSB not to make this yet another bone of contention between the NOP and EU 2092/91.

As an illustration of how damaging the continued classification of yeast as non-agricultural, please consider bread. The production of a basic 1-pound loaf of bread takes about 12 ounces of flour, about 1.4 ounces of salt, and about 0.6 ounces of yeast (the rest is water). A commercially viable bakery would probably produce at least 500 loaves at a time. The flour needed to produce the single batch of bread represents a certain amount of organic land. Bread—even organic bread—is relatively inexpensive to produce. It is also, of course, part of our daily diet. So

conceivably, tremendous amounts of acreage could be dedicated to organic farming. Now, if the yeast used to make that bread is commercial, we are diluting our cause. If, however, the yeast is organic, then not only is the bread free of the harsh chemicals used to produce commercial yeast, even more land is dedicated to organic agriculture, because organic yeast requires organic grains as a substrate. Here's a bonus: this theoretical bread is free of any synthetic substances.

I propose the following definition for "agricultural products": Products that are derived from living organisms and managed by humans. Whether these products are fit for human or animal consumption or not is irrelevant in the definition itself. Those criteria only become relevant if the "grower" is seeking organic certification for the substance. We would not, after all, seek organic certification for hemlock.

I respectfully submit that this definition could also be extended to bacterial cultures.

Further, I propose the following definition for "non-agricultural": Anything mined or synthesized.

These definitions may seem overly simplistic, but at a time when the NOSB is dealing with the impending Sunset Provision and resolution of the Harvey case, you may welcome a definition that is simple as yeast cells themselves.

Thank you for your consideration,

A handwritten signature in black ink, reading "Sheila Linderman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sheila Linderman